



*Consulting Engineers  
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April 7, 2006  
(PBW Project No. 1259)

VIA ELECTRONIC MAIL

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: March 2006 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Submittal of Final RI/FS Work Plan (SOW Paragraph 18) – submitted to EPA on March 15, 2006.
  - Submittal of Final RI/FS SAP (SOW Paragraph 26) – submitted to EPA on March 15, 2006.
  - Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) and west of the Site (relative to Site property south of Marlin Avenue) (UAO Paragraph 72) – progress report on properties for which access has been obtained and request to extend time required to complete acquisition to May 1, 2006 – submitted to EPA on March 28, 2006.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No data were received or generated during the previous month.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) and west of the Site (relative to Site property south of Marlin Avenue) (UAO Paragraph 72) – to be completed by May 1, 2006 (per March 28, 2006 extension request).
  - Implementation of RI/FS site characterization activities (SOW Paragraphs 34 through 36) – to be initiated upon approval of the Final RI/FS Work Plan and Final SAP.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – The scope of activities to be performed as part of the RI/FS is described in the RI/FS Work Plan. Until that work plan has been approved by EPA, it is not possible to estimate a percentage completion for the project.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP